

ROBERT E. GERBER
 Joseph Hage Aaronson, LLC
 485 Lexington Avenue, 30th Floor
 New York, NY 10017
 Telephone: (212) 407-1212 (NYC Office)
 Telephone: (860) 868-7926 (CT Home)

Mediator

UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF NEW YORK

-----X	:	
	:	
In re:	:	Chapter 11
	:	
RCCI WIND DOWN COMPANY, INC., <i>et al.</i> ,	:	Case Nos. 20-71970 thru 20-71974 (AST)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

UPDATED MEDIATOR’S REPORT AND STATUS LETTER

1. I am a retired judge of the United States Bankruptcy Court for the Southern District of New York, and was designated by this Court to mediate a dispute between former Debtor Rubie’s Costume Company, Inc. (now RCCI Wind Down Company, Inc.) and its debtor affiliates (together, “**Debtors**”), the Official Committee of Unsecured Creditors (the “**Committee**”), and Rubie's II, LLC (the “**Purchaser**,” and together with the Debtors and the Committee, the “**Mediation Parties**”), pursuant to this Court’s Order Assigning Matters to Mediation, dated November 9, 2020 (ECF #498) (the “**Mediation Order**”).

2. I submit this supplemental, updated, report pursuant to the Mediation Order, which provides, among other things, that the Mediator shall file a status letter as to whether the mediation resulted in a settlement. This supplemental report updates and supersedes the report I provided to the Court on the evening of Friday, December 4.

3. I am pleased to report to the Court that the mediation resulted in a settlement. The settlement will be embodied as the amalgam of two stipulations—one between Purchaser, Debtors and the Creditors’ Committee, and one between the Debtors and Creditors Committee alone. To my understanding, the drafting of the written stipulation of settlement embodying the settlement between the Purchaser, Debtors and Creditors’ Committee was completed last week, and the stipulation between the Debtors and Creditors’ Committee is substantially complete. I further understand that it is the parties’ intention to file both stipulations with the Court as soon as possible, so that each (and the settlement as a whole) can be considered by the Court at the December 16 hearing.

4. I thank the Court for its patience in this regard.

Dated: Warren, Connecticut
December 14, 2020

s/ Robert E. Gerber